

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	
JASON JONES,	:
	:
Plaintiff,	:
	:
-against-	:
	:
MAYFLOWER INTERNATIONAL HOTEL,	:
GROUP, INC., d/b/a HOWARD JOHNSON	:
LONG ISLAND CITY, AND INDIVIDUAL,	:
JACK CHANG	:
	:
Defendants.	:
-----X	

15-CV-4435 (WFK) (VMS)

STATEMENT OF DAMAGES

Pursuant to the Court's individual Rules, plaintiff Jason Jones hereby submits his statement of damages for the claims asserted in this action.

Plaintiff's claims under Federal, State and Local Law provide for the following remedies:

1. Backpay (Available Under All Statutes)

Plaintiff was paid \$10.00 per hour and worked a 40 hour work week. After plaintiff was terminated, he was without employment for 78 weeks, after which he received a job at a higher hourly rate with the United States Postal Service. Plaintiff calculates his lost back pay at \$31,200.00.

2. Compensatory Damages (Available Under All Statutes)

Plaintiff seeks compensatory damages for humiliation, mental anguish, and emotional distress. These damages are not subject to mathematical calculation but are within the discretion of the jury. Pursuant to plaintiff's claims under Title VII, compensatory damages may be

awarded to a maximum of \$300,000.00 (combined with punitive damages). No such cap exists under any of the other statutes.

3. Punitive Damages (Available Under 42 U.S.C. §1981, Title VII, and New York City Human Rights Law).

Plaintiff seeks punitive damages for conduct that was malicious and/or done with reckless indifference to his rights. These damages are not subject to mathematical calculation but are within the discretion of the jury. Pursuant to plaintiff's claims under Title VII, compensatory damages may be awarded to a maximum of \$300,000.00 (combined with compensatory damages). No such cap exists under any of the other statutes.

4. Prejudgment Interest

Plaintiff seeks prejudgment interest for any backpay awarded at the applicable statutory rates. Such damages are awarded by the Court after trial and a verdict in plaintiff's favor.

5. Costs and Attorneys Fees

Plaintiff seeks reasonable costs and attorneys fees calculated pursuant to the lodestar method. Such damages are awarded by the Court after trial and a verdict in plaintiff's favor.

Dated: New York, New York

July 30, 2023

BRUSTEIN LAW PLLC

Co-Counsel for Plaintiff

By: /s/ Evan Brustein

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